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Via ECF Filing

The Honorable Ramon E. Reyes, Jr.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: *Kaikov v. Kaikov, et. al.*, Case No. 19-cv-2521- JWB-RER
Plaintiff's Response to the Law Firm Defendants' Motion to Compel**

Dear Judge Reyes:

This firm represents Plaintiff Chalamo Kaikov in the above-referenced matter. Plaintiff does not dispute that he needs to provide responses to the Law Firm Defendants' Interrogatories and Requests for Production of Documents (the "Discovery Requests"). However, the Discovery Requests are quite voluminous – there are 21 documents requests and 25 interrogatories. Given the holidays and the fact that Plaintiff does not speak English, it is taking more time for Plaintiff to respond to the Discovery Requests than originally anticipated.

Therefore, Plaintiff respectfully requests that the Court allows him until January 22 to provide responses. This date is well before the February 4 deposition and should not cause any prejudice to the Law Firm Defendants.

We thank the Court for consideration of this matter.

Respectfully submitted,

/s/ Maria Temkin

Maria Temkin, Esq.

For: TEMKIN & ASSOCIATES, LLC

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Cc: All counsel of record (via ECF System)